

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

IN RE: PORK ANTITRUST LITIGATION

Case No. 0:18-cv-01776-JRT-JFD

This Document Relates To:  
  
ALL CLASS ACTIONS

**DECLARATION OF DR. VIET  
BAC TRAN IN SUPPORT OF  
MOTIONS TO EXCLUDE THE  
TESTIMONY OF CLASS  
EXPERTS**

I, Dr. Viet Bac Tran, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a Principal with Charles River Associates, an economic consulting firm. I hold a Ph.D. in economics from the University of Maryland and specialize in economic and statistical analysis. I am familiar with the matters that follow, and I make this declaration based on my own knowledge.

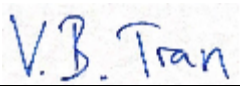
2. I have reviewed the expert reports and reply reports submitted by Drs. Mangum, Williams, and Singer (“Class Experts”) in support of plaintiffs’ motions for class certification. I have also reviewed the backup data provided with these reports.

3. Class Experts refer to mortality data produced by Defendant Seaboard Foods LLC. *E.g.*, Mangum Reply Rep., ECF No. 1617, at ¶ 155 (“In my econometric models, I incorporated a variable that reflects the rates of piglet mortality over time.”); Williams Reply Rep., ECF No. 1635, at ¶ 215 (“I use the piglet loss rate from Defendant Seaboard’s production report . . . .”); Singer Rep., ECF No. 1347, at ¶ 153 n.312 (“This data comes from a Seaboard internal analysis ‘SeaboardSD0009(Hog Production Report).’”).

4. Using their backup materials, I have confirmed that each Class Expert’s “piglet mortality” variable (sometimes referred to as a “piglet loss” variable, Williams Reply Rep. ¶ 215)

is a reference to the field “TOTAL Nursery % Total Loss” in the spreadsheet produced at SeaboardSD0009, excerpts of which are attached as Exhibit 3 to the Second Declaration of William D. Thomson. *See* Thomson Decl. Ex. 3, worksheet “Nursery - Monthly,” column O. I have also confirmed that Dr. Mangum’s “finished hog mortality” variable, Mangum Reply Rep. ¶ 150, is a reference to the field “TOTAL Finisher % Total Loss” in Exhibit 3. *See id.*, worksheet “Finisher - Monthly,” column L.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 6, 2023.

  
\_\_\_\_\_  
Dr. Viet Bac Tran